

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS**

<b>In re:</b>	)	<b>Chapter 11</b>
<b>LINC USA GP</b>	)	<b>Case No. 16-32689</b>
<div style="text-align: right;"><b>Debtor.</b></div>	)	<b>(Joint Administration Requested)</b>
<b>In re:</b>	)	<b>Chapter 11</b>
<b>LINC ENERGY FINANCE (USA), INC.</b>	)	<b>Case No. 16-32690</b>
<div style="text-align: right;"><b>Debtor.</b></div>	)	<b>(Joint Administration Requested)</b>
<b>In re:</b>	)	<b>Chapter 11</b>
<b>LINC ENERGY OPERATIONS, INC.</b>	)	<b>Case No. 16-32691</b>
<div style="text-align: right;"><b>Debtor.</b></div>	)	<b>(Joint Administration Requested)</b>
<b>In re:</b>	)	<b>Chapter 11</b>
<b>LINC ENERGY RESOURCES, INC.</b>	)	<b>Case No. 16-32692</b>
<div style="text-align: right;"><b>Debtor.</b></div>	)	<b>(Joint Administration Requested)</b>
<b>In re:</b>	)	<b>Chapter 11</b>
<b>LINC GULF COAST PETROLEUM, INC.</b>	)	<b>Case No. 16-32693</b>
<div style="text-align: right;"><b>Debtor.</b></div>	)	<b>(Joint Administration Requested)</b>
<b>In re:</b>	)	<b>Chapter 11</b>
<b>LINC ENERGY PETROLEUM (WYOMING), INC.</b>	)	<b>Case No. 16-32694</b>
<div style="text-align: right;"><b>Debtor.</b></div>	)	<b>(Joint Administration Requested)</b>
<b>In re:</b>	)	<b>Chapter 11</b>
<b>PAEN INSULA HOLDINGS, LLC</b>	)	<b>Case No. 16-32695</b>
<div style="text-align: right;"><b>Debtor.</b></div>	)	<b>(Joint Administration Requested)</b>

<b>In re:</b>	)	<b>Chapter 11</b>
	)	
<b>DIASU HOLDINGS, LLC</b>	)	<b>Case No. 16-32696</b>
	)	
<b>Debtor.</b>	)	<b>(Joint Administration Requested)</b>
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<b>In re:</b>	)	<b>Chapter 11</b>
	)	
<b>DIASU OIL &amp; GAS COMPANY, INC.</b>	)	<b>Case No. 16-32697</b>
	)	
<b>Debtor.</b>	)	<b>(Joint Administration Requested)</b>
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<b>In re:</b>	)	<b>Chapter 11</b>
	)	
<b>LINC ALASKA RESOURCES, LLC</b>	)	<b>Case No. 16-32698</b>
	)	
<b>Debtor.</b>	)	<b>(Joint Administration Requested)</b>
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<b>In re:</b>	)	<b>Chapter 11</b>
	)	
<b>LINC ENERGY PETROLEUM (LOUISIANA), LLC</b>	)	<b>Case No. 16-32699</b>
	)	
<b>Debtor.</b>	)	<b>(Joint Administration Requested)</b>

**DEBTORS' EMERGENCY MOTION PURSUANT TO  
RULE 1015 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE  
REQUESTING JOINT ADMINISTRATION OF CHAPTER 11 CASES**

Linc USA GP, *et al.*, the above-captioned debtors and debtors in possession (together, the “Debtors”), hereby move (the “Motion”) for entry of an order directing joint administration of the above-captioned related chapter 11 cases for procedural purposes only. In support of this Motion, the Debtors respectfully represent as follows:

**I. JURISDICTION**

1. The United States Bankruptcy Court for the Southern District of Texas (the “Court”) has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2).

2. Venue in this Court is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The bases for the relief requested herein are § 105(a) of title 11 of the United States Code (the “Bankruptcy Code”) and Rule 1015(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”).

## **II. BACKGROUND**

4. Together, the Debtors operate an oil and gas exploration and production business with a primary focus on the Texas Gulf Coast. Each of the Debtors is a direct or indirect subsidiary of Linc USA GP. Each of the Debtors is based in Houston, Texas. The Debtors’ properties are operated by Debtor Linc Energy Operations, Inc. (“LEO”).

5. On May 29, 2016 (the “Petition Date”), each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code.

6. A full description of the Debtors’ business, corporate structure, prepetition indebtedness, and events leading to these chapter 11 cases is set forth in the *Declaration of Jude Rolfes, Vice President of Corporate Development for the Debtors, in Support of Chapter 11 Petitions and First Day Pleadings*, (the “First Day Declaration”), filed concurrently herewith and incorporated by reference.

7. The Debtors are operating their businesses and managing their properties as debtors in possession pursuant to §§ 1107(a) and 1108 of the Bankruptcy Code.

## **III. RELIEF REQUESTED**

8. By this Motion, the Debtors respectfully request entry of an order substantially in the form filed herewith, directing joint administration of the Debtors’ chapter 11 cases for procedural purposes only. Specifically, the Debtors request that the Court maintain one file and one docket for all of the Debtors’ chapter 11 cases under the case of Linc USA GP, and that the chapter 11 cases be administered under the following caption:

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS**

<b>In re:</b>  <b>LINC USA GP, <i>et al.</i></b> <sup>1</sup>  <div style="text-align: right;"><b>Debtors.</b></div>	) ) ) ) )	<b>Chapter 11</b>  <b>Case No. 16-32689 (DRJ)</b>  <b>(Jointly Administered)</b>
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<sup>1</sup> The Debtors in these chapter cases, along with the last four digits of each Debtor's federal tax identification number, are: Linc Energy Finance (USA), Inc. (6684); Linc USA GP (5234); Linc Energy Resources, Inc. (9613); Linc Gulf Coast Petroleum, Inc. (6790); Linc Energy Petroleum (Louisiana), LLC (1074); Linc Alaska Resources, LLC (2362); Paen Insula Holdings, LLC (1681); Linc Energy Petroleum (Wyoming), Inc. (9859); Diasu Holdings, LLC (9626); Diasu Oil & Gas Company, Inc. (8926); and Linc Energy Operations, Inc. (5806).

9. The Debtors also request that an entry be made on the docket of Linc Energy Finance (USA), Inc., Linc USA GP, Linc Energy Resources, Inc., Linc Gulf Coast Petroleum, Inc., Linc Energy Petroleum (Louisiana), LLC, Linc Alaska Resources, LLC, Paen Insula Holdings, LLC, Linc Energy Petroleum (Wyoming), Inc., Diasu Holdings, LLC, Diasu Oil & Gas Company, Inc., and Linc Energy Operations, Inc. to reflect joint administration of the chapter 11 cases substantially similar to the following:

An order has been entered in this case directing the procedural consolidation and joint administration of the chapter 11 cases of Linc Energy Finance (USA), Inc., Linc USA GP, Linc Energy Resources, Inc., Linc Gulf Coast Petroleum, Inc., Linc Energy Petroleum (Louisiana), LLC, Linc Alaska Resources, LLC, Paen Insula Holdings, LLC, Linc Energy Petroleum (Wyoming), Inc., Diasu Holdings, LLC, Diasu Oil & Gas Company, Inc., and Linc Energy Operations, Inc. The docket in Case No. 16-32689 should be consulted for all matters affecting this case.

**IV. BASIS FOR RELIEF**

10. Bankruptcy Rule 1015(b) authorizes this Court to order the joint administration of the bankruptcy cases of a debtor and its affiliates. Linc USA GP is an "affiliate" of each Debtor entity, as such term is defined in § 101(2) of the Bankruptcy Code. Accordingly, the Court is authorized to grant the relief requested in this Motion.

11. The Debtors anticipate that, during the course of these cases, it will be necessary to file numerous motions and applications, as well as other pleadings and documents, seeking relief on behalf of all Debtors. The Debtors respectfully submit that joint administration of their chapter 11 cases is in the best interests of their estates, creditors, and other parties-in-interest and will further the interests of judicial economy and administrative expediency by, among other things, obviating the need to: (i) file duplicate motions, (ii) enter duplicate orders, and (iii) forward unnecessary, duplicate notices and other documents to creditors and other parties-in-interest, which actions would cause the Debtors' estates to incur unnecessary costs and expenses.

#### **V. NOTICE**

12. The Debtors will provide notice of this Motion to: (a) the Office of the United States Trustee for the Southern District of Texas; (b) the entities listed on the Consolidated List of Creditors Holding the 30 Largest Unsecured Claims against the Debtors filed pursuant to Bankruptcy Rule 1007(d); (c) all known or alleged secured creditors; (d) the Office of the United States Attorney General for the State of Texas; (e) the Australian Securities and Investments Commission; (f) the Internal Revenue Service; and (g) any party who has requested notice pursuant to Bankruptcy Rule 2002. In light of the nature of the relief requested in this Motion, the Debtors respectfully submit that no further notice is necessary.

#### **VI. NO PRIOR REQUEST**

13. No prior motion for relief requested herein has been made to this or any other court.

#### **VII. CONCLUSION**

WHEREFORE, the Debtors respectfully request that the Court enter an order, substantially in the form filed herewith, granting the relief requested in this Motion, and such

other and further relief as may be just and proper under the circumstances.

Respectfully Submitted,

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